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FILE NO.: 15786.0003

April 24, 2023

By ECF

Honorable Hector Gonzalez
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Chi Kwan Wong*
Criminal Docket No. 1:23-cr-00088 (HG)
Request to Adjourn Conference on Consent

Dear Judge Gonzalez:

We represent Chi Kwan Wong in connection with Indictment 1:23-cr-00088, pending before Your Honor. We write, with the consent of the Government, to respectfully request an adjournment of approximately 30-days of the upcoming April 27, 2023 conference in the above captioned matter, to a date convenient for the Court in or about the end of May or beginning of June. The Government and counsel for the defendant jointly seek that adjournment for the purpose of continuing discussions regarding a potential pretrial resolution of the case, and to allow defense counsel sufficient time to review discovery, which is significant and still being produced. The defendant is aware of his rights under the Speedy Trial Act and consents to the exclusion of Speedy Trial time between April 27, 2023, and any adjourn date chosen by the Court, in the interests of justice. A draft proposed order is filed along with this letter.

Counsel for the defense and the Government are available for the conference on the following dates, if they are convenient for the Court: May 25th, May 26th, May 30th, May 31st and June 1st.

Respectfully submitted,

_____/s/_____

Robert A. Del Giorno

cc: AUSA Andrew Estes (via Ecf)

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